

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF MISSOURI  
3

4 MISSOURI PRIMATE FOUNDATION, et al.,  
5 Plaintiff,

6 vs.

Case No.

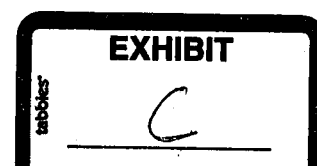
7 PEOPLE FOR THE ETHICAL TREATMENT 4:16-cv-02163-CDP  
8 OF ANIMALS, INC., et al.,  
9 Defendant.

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13  
14 Videotaped Deposition of CONNIE BRAUN CASEY,  
15 taken on behalf of the Defendant, at the offices of  
16 Rynearson, Suess, Schnurbusch & Champion, LLC, 500  
17 N. Broadway, Suite 1550, in the City of St. Louis,  
18 State of Missouri, on the 29th day of October, 2018,  
19 before Kristine A. Toennies, RMR, CRR, CRC, CCR  
20 (MO), CSR (IL & IA), and Notary Public.  
21  
22  
23

24 JOB No. 3027726

25 PAGES 1 - 338



1 refer to Missouri Primate Foundation as MPF. Do you  
2 understand that?  
3 A Yes.  
4 Q In or around November 2, 2016, did you  
5 receive a notice or a notice letter from PETA and  
6 Angela Scott that they intended to file suit against  
7 you, MPF and others?  
8 A Yes.  
9 Q And do you recall the notice proposed that  
10 the chimpanzees that were housed at the facility at  
11 the time should be retired to an accredited  
12 sanctuary?  
13 A It was in the letter?  
14 Q Yes.  
15 A Yes.  
16 Q And did you discuss that proposal with the  
17 MPF board of directors?  
18 A Yes, we talked.  
19 Q Who was on the board of directors at the  
20 time?  
21 A Lisa Harned, Debbie Marshall, myself and --  
22 Q You were on the board?  
23 A Well, I don't know. I think I was. I'm not  
24 sure.  
25 Q Who else was on the board?

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1 A Doug, Dr. Doug Pernikoff.  
2 Q And what did the board discuss about the  
3 proposal to send chimpanzees to an accredited  
4 sanctuary?  
5 A What we discussed is I take very good care  
6 of my chimpanzees. I don't feel that the  
7 sanctuaries can do any better a job with my  
8 chimpanzees, and I didn't think it was proper, and  
9 who is PETA or Angela Scott to want to take my  
10 animals that I love as my family and move them to  
11 another sanctuary that's got two or three hundred  
12 chimpanzees. How could they know my chimpanzees and  
13 care for them any better than I can?  
14 Q That is what the board discussed?  
15 A That's what we discussed.  
16 Q Well, I'm not asking about "we" because --  
17 A Okay, you asked the people on the board?  
18 Q I have to finish. I want to know what the  
19 board of directors discussed.  
20 A I just told you.  
21 Q Okay. So the board of directors had that  
22 discussion? If I ask the other board members, they  
23 could confirm that that discussion took place?  
24 A Yes.  
25 Q Were any minutes taken --

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1 A No.  
2 Q -- of that discussion?  
3 A No. It wasn't at a proper board meeting.  
4 Q Did the board convene? Were all the board  
5 members --  
6 A No, no.  
7 Q Do you understand what it means to have a  
8 board?  
9 A Yes.  
10 Q I'm not asking about whether you had  
11 individual discussions with individuals at certain  
12 periods of time. I would like to know whether you  
13 discussed the proposal with the board of directors?  
14 A All together at one time?  
15 Q Yes.  
16 A No.  
17 Q Why not?  
18 A We just didn't.  
19 Q Do you recall about a month after you  
20 received the initial notice receiving a letter from  
21 PETA's and Angela Scott's lawyer again proposing  
22 that the chimpanzees at MPF, at the facility, should  
23 be retired to an accredited sanctuary?  
24 A Yes.  
25 Q And did you discuss that proposal with the

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1 board of directors?  
2 A No.  
3 Q Why not?  
4 A Because we weren't together and didn't have  
5 a board meeting.  
6 Q I'm sorry?  
7 A We were not together at a board meeting.  
8 Q Did you ever have any board meetings?  
9 A No.  
10 Q Why not?  
11 A Because we just didn't.  
12 Q Are you aware that at the time that the  
13 board did not function as a board?  
14 A I guess.  
15 Q And why didn't you do -- not do anything to  
16 correct that?  
17 A We just didn't have any board meetings.  
18 Q Right. The question is why?  
19 A Because we just did not do it. There was  
20 not time. We didn't get together.  
21 Q Did you do anything that was required to be  
22 done in order for the Missouri Primate Foundation to  
23 function as a nonprofit organization?  
24 A As far as a board meeting?  
25 Q As far as recordkeeping, as far as any

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1 activity of -- that are required to be undertaken of  
2 a nonprofit organization.  
3 MS. CHAMPION: I'm going to object as  
4 calling for a legal conclusion. You can answer if  
5 you know.  
6 A I guess not.  
7 Q (By Ms. Bernstein) Was it your understanding  
8 from the second letter that you received that PETA  
9 and Ms. Scott would not approve if you transferred  
10 the chimpanzees to an unaccredited zoo instead of an  
11 accredited sanctuary?  
12 MS. CHAMPION: I'm going to object as  
13 calling for speculation, but you can answer.  
14 A When you talk about accredited, you're just  
15 talking about PETA accredited? There's lots of  
16 sanctuaries out there, lots of private-owned  
17 sanctuaries that is not PETA accredited or GFAS  
18 accredited.  
19 Q (By Ms. Bernstein) Right.  
20 A But are accredited sanctuaries.  
21 Q Right. But you recall in the letter that  
22 you received the proposal by PETA and Ms. Scott were  
23 to send the chimpanzees at the facility to a  
24 sanctuary accredited by the Global Federation of  
25 Animal Sanctuaries, otherwise known as GFAS?

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1 A Are you asking me if I seen that in the  
2 letter?  
3 Q Right.  
4 A Yes.  
5 Q So you understood that what PETA and  
6 Ms. Scott proposed was to send the chimpanzees to a  
7 sanctuary accredited by GFAS?  
8 A Yes, I understand that.  
9 Q And you therefore also understood that PETA  
10 and Ms. Scott would not approve if you were to send  
11 the chimpanzees let's say to an unaccredited private  
12 zoo, for example?  
13 MS. CHAMPION: I'm going to object as  
14 calling for speculation. You can answer.  
15 A I'm not exactly sure how to answer that  
16 question because I felt it was none of PETA or  
17 Angela Scott's business to start off with.  
18 Q (By Ms. Bernstein) Okay. So you did not  
19 care whether or not or what PETA and Ms. Scott would  
20 want to approve or not?  
21 A Right, because those chimpanzees are my  
22 life, and they belong to me. It's none of PETA or  
23 Angela Scott's business.  
24 Q Right. So it would certainly be false to  
25 say that when you transferred some of the

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1 chimpanzees, you did it in order to address PETA and  
2 Ms. Scott's concerns?  
3 A No, that's not true. When those chimpanzees  
4 were transferred, that was discussed way before I  
5 ever got that letter from PETA.  
6 Q So this transfer that you referred to, the  
7 first transfer took place on December 22, 2016; is  
8 that correct?  
9 A That's probably correct.  
10 Q And what were the names of the chimpanzees  
11 you send -- you transferred in December of 2016?  
12 A Kirby, KK and Daisy.  
13 Q And where were they transferred to?  
14 A DeYoung Zoo.  
15 Q And why did you decide to send Kirby, KK and  
16 Daisy to the DeYoung Zoo in December of 2016?  
17 A Well, as I said, it was previously  
18 discussed, and when they had their facility upgraded  
19 and ready, it was discussed that those three would  
20 be sent.  
21 Q Kirby, KK and Daisy were identified  
22 previously as three chimpanzees who you would  
23 transfer to the DeYoung Zoo?  
24 A Uh-huh, yes, ma'am.  
25 Q And with whom did you have those

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1 discussions?  
2 A Carrie. She also -- she goes by Carrie  
3 Cramer or Carrie DeYoung.  
4 Q And when did you have those discussions with  
5 her?  
6 A There was some discussion in 2015. We  
7 talked off and on over the years but basically 2015  
8 and 2016.  
9 Q And were those discussions over the phone or  
10 via e-mail or correspondence?  
11 A They were -- some were over the phone and  
12 some were in person.  
13 Q Which ones were in person?  
14 MS. CHAMPION: I'm going to object as vague.  
15 Q (By Ms. Bernstein) Can you identify  
16 conversations you had in person with Carrie Cramer?  
17 MS. CHAMPION: Are you asking her what she  
18 talked about in person? I'm going to object again  
19 as vague. I'm not sure what you're talking about,  
20 but if you know, you can answer.  
21 Q (By Ms. Bernstein) Can you identify those  
22 communications that you had in person?  
23 A I talked to Carrie. She came to visit the  
24 facility, look at the facility, get ideas as far as  
25 working on their facility, and I talked about once

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1 A Well, they came down and looked at my  
2 facility, my cages, my transfer chutes, how I did  
3 other things and were building theirs so it would be  
4 very similar to mine so when the chimps were moved,  
5 it would be less stress for the animals because it  
6 would be like what they were used to.  
7 Q Have you seen photographs of the completed  
8 facility?  
9 A I have.  
10 Q Who showed you those photographs?  
11 A Carrie.  
12 Q Did she give you those photographs?  
13 A No.  
14 Q Did she mail them to you?  
15 A No; she showed them to me on her phone.  
16 Q She showed you photographs on the phone?  
17 A On her -- yeah, on her phone.  
18 Q Do you recall at some point Mr. Reeg  
19 requested to withdraw from representing you and MPF  
20 and others in this lawsuit?  
21 A Yes.  
22 Q And who was the person or persons who  
23 decided that MPF would not hire any attorney to  
24 defend the claims against MPF after Mr. Reeg  
25 withdrew from the case?

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1 A I think at that time MPF was no longer in  
2 existence. The corporation was already dissolved.  
3 Q Right, and who made the decision that the  
4 dissolved corporation would not be represented by an  
5 attorney?  
6 A Probably me, I guess. I'm not sure that it  
7 came right out as a decision.  
8 Q Well, you made a decision to find an  
9 attorney to represent you; is that right?  
10 A Yes.  
11 Q Why did you not also find attorneys to  
12 represent MPF?  
13 A I guess because it was dissolved.  
14 Q Does MPF currently carry on any activities?  
15 A No.  
16 Q Can you identify all persons or entities who  
17 have in the past three years donated funds or other  
18 goods or services for the upkeep of the primates at  
19 your facility?  
20 MS. CHAMPION: Did you say goods or funds?  
21 Q (By Ms. Bernstein) Goods or -- funds or  
22 other goods or services for the upkeep of the  
23 primates at your facility, all donors during the  
24 past three years.  
25 MS. CHAMPION: I'm going to object as

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1 compound, but she wants to know donors for services,  
2 goods and funds, so you might want to take that one  
3 at a time.  
4 A Tonia Haddix, Lisa Harned, Penny Healzer,  
5 Byron Healzer, Kevin Harned. There was an auction  
6 put up to help with the chimps and attorney fees,  
7 and then probably there was a few like donation  
8 jars.  
9 Q (By Ms. Bernstein) Do you have any records  
10 to keep track of donations?  
11 A Where some have come into the bank account  
12 and otherwise just what was in the donation jars.  
13 There hasn't been very much donations.  
14 Q The bank account, is that in your personal  
15 name, or did MPF have an account?  
16 A Yes.  
17 Q MPF had an account?  
18 A Yes.  
19 Q Was that account closed or is it still open?  
20 A It's still open.  
21 Q Is it still receiving donations?  
22 A I guess if anything comes in, it would be.  
23 There's very little donations come in.  
24 Q But the account has not been closed for MPF?  
25 A No.

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1 Q Do you recall the last time donations came  
2 in to the MPF account?  
3 A I would have to look it up. Probably within  
4 the last month.  
5 Q And who made the donation to the MPF  
6 account?  
7 A It would have been from an auction that was  
8 put up online to try to raise money to help with  
9 attorney fees.  
10 Q Well, currently MPF doesn't have an  
11 attorney; right?  
12 A Well, when I referred to MPF, I guess I  
13 refer to the caring for the chimpanzees or the  
14 attorney for them, so I guess not.  
15 Q Who decides what to do with the money that  
16 gets deposited into the MPF account?  
17 A I would.  
18 Q You don't ask the board?  
19 A As far as I know right now there is no  
20 board; correct?  
21 Q I'm asking you.  
22 A No, I guess the answer is not. I guess the  
23 answer is no.  
24 Q So you're the person who decides what to do  
25 with the money that is donated to MPF?

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1 A Yes, ma'am.  
2 Q And has that always been the case?  
3 A Yes, ma'am. I can tell you right now the  
4 money that goes in there goes strictly for those  
5 chimpanzees.  
6 Q Well, are there any records of that?  
7 A I guess my checkbook account.  
8 Q Currently who pays for the legal expenses to  
9 represent you in this lawsuit?  
10 A It comes from various -- if I can get  
11 donations from an auction that people put up to  
12 help, it comes from there.  
13 Q Are those donated to MPF, the nonprofit, and  
14 go into MPF's account?  
15 A No. They're donated to Connie Casey, and I  
16 have funneled them right into the Missouri Primate  
17 Foundation account.  
18 Q Who donated over the past three months or  
19 where did the money come from that you paid your  
20 current attorneys?  
21 MS. CHAMPION: Compound. You can answer  
22 whichever of those questions you want to answer.  
23 A It's just various people; plus, I had some  
24 of my other exotics.  
25 Q (By Ms. Bernstein) Right, the various

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1 people, can you identify who gave you money to pay  
2 for your attorneys?  
3 A No.  
4 Q I'm sorry?  
5 A I --  
6 Q Who are the people who gave you money to pay  
7 for your attorneys?  
8 A Various people.  
9 Q Yes. Please tell me their names.  
10 A I don't know all their names.  
11 Q Tell me the people who you recall.  
12 A Tonia Haddix has been beneficial for helping  
13 with attorney fees.  
14 Q Who else?  
15 A The people -- I don't know. There's various  
16 people that's donated money and bought auction items  
17 to put into the account. I don't know those -- you  
18 have the records. I seen it on your things. I  
19 don't know. I don't have my paperwork.  
20 Q What records do you have that shows who pays  
21 for your legal fees?  
22 A What records?  
23 Q Yes, if you wanted to look up to refresh  
24 your recollection.  
25 A Okay, you know that I have a Go Fund Me

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1 account, and you know -- you know that I have the  
2 auction account.  
3 Q You have an auction account?  
4 A That was set up by friends. It wasn't set  
5 up by me.  
6 Q Who set it up?  
7 A I can't remember her name right now. A  
8 friend that's got monkeys.  
9 Q But there are records that would show?  
10 A Yes.  
11 Q Okay. Who else has given you money to pay  
12 for your lawyers?  
13 A I've got money out of a donation jar. I  
14 have no idea who put money in there.  
15 Q Who else?  
16 A That's it. That's all I can remember.  
17 Q Have you recently paid legal fees?  
18 MS. CHAMPION: I'm going to object as --  
19 what relevance does that have? I want to hear from  
20 you how you think that's a proper question.  
21 MS. BERNSTEIN: Well, the payment of legal  
22 fees is going to be an issue, and the finances of  
23 the person who will be asked to pay legal fees --  
24 MS. CHAMPION: Have we asked you for legal  
25 fees to be paid to her?

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1 MS. BERNSTEIN: No.  
2 MS. CHAMPION: Then I don't think it's  
3 relevant, and I'm going to object and instruct you  
4 not to answer. I also think it's attorney-client  
5 privileged, and I also think you know it's an  
6 absolutely improper question, but that we can take  
7 up later. But at any rate, I'm advising her not to  
8 answer.  
9 Q (By Ms. Bernstein) You will not tell me when  
10 you last paid a legal fee?  
11 A When I last paid a legal fee?  
12 Q Yes.  
13 A I don't remember. I'll have to look it up  
14 in my checkbook.  
15 Q It was paid from your checking account?  
16 A From Missouri Primate checking account.  
17 Q From the MPF account? How much money is  
18 currently in the MPF account?  
19 A Less than \$400.  
20 Q Do you expect any money to come in to  
21 replenish that account?  
22 A I hope so.  
23 Q Are you currently asking or soliciting  
24 donations for that account?  
25 A I have friends that's asking.

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